

EXHIBIT 10

Joseph L. Grant

May 31, 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, BOTH
INDIVIDUALLY AND AS LEGAL
GUARDIAN OFSHANE ALLEN
LOVELAND; AND JACOB SUMMERS,

Plaintiff,

vs.

CASE NO. 8:18CV127

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

DEPOSITION OF: JOSEPH L. GRANT

DATE: May 31, 2019

TIME: 9:00 a.m.

LOCATION: A. William Roberts Jr. & Associates
6135 Park South Drive
Charlotte, NC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: SOLANGE RUIZ-URIBE, Court Reporter

A. WILLIAM ROBERTS, JR., & ASSOCIATES
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1 first thing.

2 The second thing is the inflation
3 pressure in a tire, it's not just a tire, it's a
4 tire wheel assembly. And it's actually a tire wheel
5 valve assembly. We don't know what other wheels
6 that this tire may have been on, what the condition
7 of those wheels may have been, how corroded they may
8 have been.

9 It may have allowed for leakage
10 between the tire and the wheel. We don't know the
11 previous valves that were and what the condition of
12 the valves that this tire has been on. So we're
13 really dealing with -- all I can really offer to you
14 is that, again, in the 21-year history of the tire
15 there has been some over deflection.

16 Q. Well, you also said some over deflection
17 occurred in the last 9,000-miles.

18 A. Well, polished flanges indicate to me that
19 there is a good chance that some of it may have
20 occurred during this last portion of time and I'm
21 not -- there is no way, and I've said it before to
22 you, there is no way to really sort that out and as
23 a result I'm not overly critical of the last
24 10,000 miles.

25 I'm just telling you that during its

1 entire life there has been some history over
2 deflection, didn't cause the tire to fail, it was
3 not going to cause the tire to fail, it was not
4 going to cause the tire to fail but it's just not
5 good for the tire, and it makes the tire more
6 susceptible to things like road hazard impact
7 damage.

8 Q. So this over deflection had nothing to do
9 with the failure?

10 A. That's not what I said. I said that it
11 makes the tire weaker, it makes the tire more
12 susceptible to not being able to withstand a road
13 hazard impact, so it is part of the failure
14 analysis.

15 Q. I've got it. But you're saying -- the big
16 component here you believe is this tire hit
17 something?

18 A. Yes.

19 Q. Okay. We're going -- well, let's just do
20 it now. What did it hit?

21 A. There is no way to know exactly what it
22 hit. Obviously, it hit something that the tire
23 could not envelope or shape over without doing
24 internal damage to the structure.

25 Q. All right. I need a date, what date did

1 So when I think about all of that
2 from a technical standpoint, you know, we're talking
3 somewhere in the last anywhere from 500 miles maybe
4 up to a couple thousand miles of what it may have
5 taken previously before the final failure when this
6 impact occurred.

7 Q. Okay. So what did you say, 500 to a
8 thousand?

9 A. It could be couple of thousand.

10 Q. 500 to 2,000?

11 A. Yeah, it doesn't go back -- it doesn't go
12 back 10,000-miles or 30,000-miles, this is something
13 that happened kind of late in the service life of
14 this tire in a very localized area with enough
15 mileage, depending upon how the tire is being used,
16 and that's a big part of it is after -- is how is
17 the tire being used. But it's happened late in the
18 life in a localized area to create this polishing
19 and the separation, and that's pretty reasonable for
20 a mileage of what would have occurred.

21 Q. Can you tell me the number of days, or
22 weeks, or months this vehicle drove after the impact
23 occurred?

24 A. No.

25 Q. All right. And can you tell me the number